

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA**

ALBERT CLAYTON SIMMONS,

Plaintiff,

v.

Case No. 1:24-cv-1789

AMERICAN INSTITUTE OF  
CERTIFIED PUBLIC  
ACCOUNTANTS, GEORGIA  
SOCIETY OF CERTIFIED PUBLIC  
ACCOUNTANTS, GEORGIA STATE  
BOARD OF ACCOUNTANCY, and  
GREEN, MOSIER & KEMP, LLC

Defendants.

**DEFENDANTS AMERICAN INSTITUTE OF CERTIFIED PUBLIC  
ACCOUNTANTS, GEORGIA SOCIETY OF CERTIFIED PUBLIC  
ACCOUNTANTS, and GREEN, MOSIER & KEMP, LLC's JOINT  
MOTION TO STAY DISCOVERY,  
PRETRIAL DEADLINES, AND LOCAL RULE DEADLINES**

Defendants American Institute of Certified Public Accountants, Georgia Society of Certified Public Accountants, and Green, Mosier & Kemp, LLC (“GMK”), respectfully move this Court for an order staying discovery, all pretrial deadlines, and all local rule deadlines, until the Court rules on GMK and the co-defendants’ pending Motions to Dismiss. As set forth in the accompanying Memorandum in support of this motion, good cause exists for granting it. The Motions to Dismiss are dispositive of the case and, if granted, will eliminate the need

for discovery. A stay will avoid the potential unnecessary time and expense of the parties. Therefore, these Defendants propose that the discovery period be stayed until 30 days after the Court's final ruling on the Motions to Dismiss, that the deadlines for service of Initial Disclosures, per LR 26.1, and the Rule 26(f) Early Planning Conference, per LR 16.1, be extended until 30 days after the Court's final ruling on Defendants' Motions to Dismiss, and that the deadline for filing the Joint Preliminary Report and Discovery Plan, per LR 16.2, be extended to 30 days after the Early Planning Conference.

Respectfully submitted, this the 11th day of July, 2024.

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***Accountants and the Georgia Society  
of Certified Public Accountants***

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**CERTIFICATE OF SERVICE AND COMPLIANCE**

I hereby certify that I have this day electronically filed the foregoing document with the Clerk of Court using the Court's CM/ECF system, which will automatically send email notification of such filing to all counsel of record and that the foregoing complies with font and point selection approved by this Court in Local Rule 5.1. Further, I hereby certify that I have this day served the foregoing via First-Class U.S. Mail and email to, Plaintiff, pro se:

Albert Clayton Simmons  
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[acspc.cpa@gmail.com](mailto:acspc.cpa@gmail.com)

This the 11th day of July, 2024.

/s/ Lewis P. Perling

Lewis P. Perling

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